

**PURPOSE**

The Michigan Department of Health and Humans Services (MDHHS) is responsible for training all members of its workforce of the MDHHS's privacy policies and procedures regarding the proper use and disclosure of PHI. This procedure describes the process when changes are made to the MDHHS policies or procedures or when the department changes its privacy practices.

**Bureau of Legal Affairs' Staff**

1. Prepares or oversees changes to training materials when changes are made to the MDHHS policies or procedures or when the MDHHS changes its privacy practices in collaboration with the MDHHS privacy strategic group and the hospitals privacy group.
2. Retains the training material for six years.
3. Identifies role-specific employees affected by the changes to the MDHHS policies or procedures or the MDHHS privacy practices.
4. Develops training plan, taking into account role-specific employees affected by the changes.
5. Implements, or oversees the implementation of, the training plan.
6. Coordinates with and involves the MDHHS's human resources and training unit to prepare updated training materials and to conduct training.
7. Ensures documentation of training for identified employees and maintains documentation in the HIPAA privacy office.
8. Retains original training documentation for six years.

**REFERENCES**

45 CFR §164.530(b).

**CONTACT**

For additional information concerning this procedure, contact MDHHS Bureau of Legal Affairs.